IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
v.	)	**Magistrate No.**
	)	
MICHAEL TODD WOLFE, a/k/a,	)	
"Faruq."	)	

MOTION FOR DETENTION

The United States, by and through its Assistant United States Attorney, files this motion for pretrial detention under Title 18, United States Code, § 3141, et seq., and would show the Court the following:

1. The Government seeks a detention hearing pursuant to Title 18, U.S.C. § 3142(f) because the pending case involves:

a. A serious risk that the Defendant will flee. Title 18 U.S.C. § 3142(f)(2)(A); and

b. An offense listed in Section 2332b(g)(5)(B) for which a maximum term of imprisonment of ten (10) years or more is prescribed – in this case Title 18, United States Code §2339A – Providing Material Support to Terrorists. Title 18, United States Code, § 3142(f)(1)(A). As such, there is a *rebuttable presumption* for detention under Title 18, United States Code, § 3142(e)(2).

2. No condition or combination of conditions will:

(a) Reasonably assure the appearance of the person as required.

(b) Reasonably assure the safety of the community or any other person.

The United States may advocate additional reasons for detention other than those indicated above as the investigation proceeds and new information becomes available.

Pursuant to 18 U.S.C. § 3142(f) and (d), the United States moves that the detention hearing be continued for **THREE (3)** days, excluding Saturdays, Sundays and holidays, so that the United States can prepare for said hearing.

The Government requests that the Defendant be detained and held without bond.

Respectfully submitted,

ROBERT PITMAN
UNITED STATES ATTORNEY

/s/Gregg N. Sofer_______________

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